

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CARLOS MEDINA CENTENO

DEBTOR

CASE NO 16-04961-MCF

CHAPTER 13

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN  
AND CERTIFICATE OF SERVICE**

**TO THE HONORABLE COURT:**

**NOW COMES, CARLOS MEDINA CENTENO**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays:

1. The debtor is hereby submitting a proposed amended Plan, dated December 2, 2016, herewith and attached to this motion.
2. This proposed amended Plan is filed to increase the Plan base in order to cure the "insufficiently funded" issue raised by the Trustee in his unfavorable recommendation (docket #23).

**WHEREFORE** debtor respectfully requests the confirmation of the requested amended Plan, dated December 2, 2016.

**I CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtor in the above captioned case, and to all creditors and parties in interest appearing in the master address list, hereby attached.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 2<sup>nd</sup> day of December, 2016.

/s/ Roberto A. Figueroa Colón  
ROBERTO A. FIGUEROA COLON  
USDC #300105  
FIGUEROA & SERRANO, PSC  
PO BOX 1635  
GUAYNABO PR 00970-1635  
TEL. NO. (787) 744-7699

United States Bankruptcy Court  
District of Puerto Rico, San Juan Division

IN RE:

Case No. **3:16-bk-4961**

**MEDINA CENTENO, CARLOS**

Chapter **13**

Debtor(s)

**CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☐ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.  
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____		<input checked="" type="checkbox"/> AMENDED PLAN DATED: <b>12/02/2016</b>	
<input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
<b>I. PAYMENT PLAN SCHEDULE</b>		<b>II. DISBURSEMENT SCHEDULE</b>	
<p>\$ <b>500.00</b> x <b>12</b> = \$ <b>6,000.00</b> \$ <b>520.00</b> x <b>48</b> = \$ <b>24,960.00</b> \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____  TOTAL: \$ <b>30,960.00</b></p> <p>Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from:  <input type="checkbox"/> Sale of Property identified as follows: _____  <input type="checkbox"/> Other: _____  Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ <b>30,960.00</b></p>		<p>A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input type="checkbox"/> Trustee pays secured ARREARS: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. <b>Firstbank Puerto Ric</b> Cr. _____ Cr. _____ # <b>Claim 1-1</b> # _____ # _____ \$ <b>15,559.78</b> \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:  5. <input type="checkbox"/> Other:  6. <input type="checkbox"/> Debtor otherwise maintains regular payments directly to:  C. PRIORITIES: The Trustee shall pay priorities in accordance with the law, 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements.</p> <p>OTHER PROVISIONS: (<i>Executory contracts; payment of interest to unsecureds, etc.</i>) * After confirmation of Plan Trustee will pay Firstbank PR (POC 1-1) concurrently with attorney's fees in a 50/50% basis; once attorney's fees are paid in full the Trustee will pay Firstbank PR (POC 1-1) ahead any other secured claim. * Debtor to provide Adequate Protection Payments to Firstbank Puerto Rico through the Trustee in the sum \$277 per month until confirmation, and to be paid retroactively since petition date. * Debtor to provide auto insurance (Eastern America Insurance Company) upon maturity to Firstbank Puerto Rico through Chapter 13 Plan. * Late filed claims filed by creditors will receive no distribution. * Debtor reserves the right to object claims after Plan confirmation. * ASUME: arrears (\$7,926.78) will be paid through the Trustee. Debtor to continue making current direct payments to ASUME.</p>	
<b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)  Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <b>2,868.00</b>			
Signed: <b>/s/ CARLOS MEDINA CENTENO</b> Debtor   Joint Debtor			

Attorney for Debtor **Figueroa & Serrano, PSC**

Phone: **(787) 744-7699**

CHAPTER 13 PAYMENT PLAN

Label Matrix for local noticing  
0104-3  
Case 16-04961-MCF13  
District of Puerto Rico  
Old San Juan  
Fri Dec 2 12:52:01 AST 2016

COOP. AGUADILLA  
PO BOX 541  
AGUADILLA, PR 00605-0541

FIRSTBANK PR  
PO BOX 9146  
SAN JUAN, PR 00908-0146

US Bankruptcy Court District of P.R.  
Jose V Toledo Fed Bldg & US Courthouse  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

ASUME  
PO Box 11218  
San Juan, PR 00910-2318

ASUME-LAURA AVILES BIRRIEL  
PO BOX 71316 SAN JUAN PR 00936-8416

Att Services  
PO Box 192830  
San Juan, PR 00919-2830

CREDITONE, LLC  
P.O. BOX 625  
METAIRIE, LA 70004-0625

Cingular/at&T  
AT&T/C/O Midland Bankruptcy  
5407 Andrews Hwy  
Midland, TX 79706-2851

Coop A/C Aguadilla  
PO Box 541  
Aguadilla, PR 00605-0541

Dish  
9601 S Meridian Blvd  
Englewood, CO 80112-5905

FIRST BANK  
CONSUMER SERVICE CENTER  
BANKRUPTCY DIVISION - CODE 248  
PO BOX 9146, SAN JUAN PR 00908-0146

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

Island Finance  
PO Box 71504  
San Juan, PR 00936-8604

LAURA ELISA AVILES BIRRIEL  
EXT SAN ANTONIO ST 5 F35  
CAGUAS PR 00725

LVNV Funding, LLC its successors and assigns  
assignee of Citibank (South Dakota),  
N.A.  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

LVNV Funding, LLC its successors and assigns  
assignee of Household Bank (SB), N.A.  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Liberty Cablevision of PR  
PO Box 192296  
San Juan, PR 00919-2296

MIDLAND FUNDING LLC  
PO Box 2011  
Warren, MI 48090-2011

Midland Funding  
2365 Northside Dr  
San Diego, CA 92108-2709

(p)SPRINT NEXTEL CORRESPONDENCE  
ATTN BANKRUPTCY DEPT  
PO BOX 7949  
OVERLAND PARK KS 66207-0949

Synchrony Bank  
c/o of Recovery Management Systems Corp  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

ALEJANDRO OLIVERAS RIVERA  
ALEJANDRO OLIVERAS CHAPTER 13 TRUS  
PO BOX 9024062  
SAN JUAN, PR 00902-4062

CARLOS MEDINA CENTENO  
ALTURAS DEL TURABO II 14 CALLE 600  
CAGUAS, PR 00725

MONSITA LECAROS ARRIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901

ROBERTO ARISTIDES FIGUEROA-COLON  
FIGUEROA & SERRANO, PSC  
PO BOX 1635  
GUAYNABO, PR 00970-1635

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Sprint  
PO Box 4191  
Carol Stream, IL 60197-4191

End of Label Matrix	
Mailable recipients	25
Bypassed recipients	0
Total	25